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May 24, 2006

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California Air Resources Board
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**Re: Comments Regarding CARB's Proposed Revisions to the Certification
Procedure for Vapor Recovery Systems, CP 201.**

The California Air Pollution Control Officers Association (CAPCOA) appreciates the opportunity to submit comments regarding the proposed changes to section 94011, title 17, Californian Code of Regulations and incorporated in Vapor Recovery Certification Procedure For Vapor Recovery Systems At Gasoline Dispensing Facilities, CP 201, and the associated Definitions for Vapor Recovery Procedures, D-200 released for public review on April 7, 2006.

CAPCOA supports the proposed revisions. The addition of the State Water Resources Board review of applications for equipment certification will support certification of new vapor recovery systems and components which will meet both air and water pollution prevention requirements. Clarifications in the proposed CP201 sections will enhance the evaluation of certification renewal applications and streamline the process of addressing deficiencies in certified system components.

The air districts use CP201 in two ways:

- In working with California Air Resources Board staff to review applications for system certifications, modifications and certification renewals.
- As guidance in implementing the vapor control strategies developed by California Air Resources Board staff consistently throughout the State of California and with Article 5 of the California Health and Safety Code.

Thank you again for working with members of the CAPCOA Vapor Recovery Committee to improve the performance and reliability of vapor recovery equipment certified by your staff.

Sincerely,

Barbara A. Lee
President, CAPCOA

cc: Catherine Witherspoon, Executive Officer